

# County of Los Angeles DEPARTMENT OF CHILDREN AND FAMILY SERVICES

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November 19, 2014

To:

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From:

Philip L. Browning

Director

## WINGS OF REFUGE FOSTER FAMILY AGENCY CONTRACT COMPLIANCE MONITORING REVIEW

The Department of Children and Family Services (DCFS) Out-of-Home Care Management Division (OHCMD) conducted a review of Wings of Refuge Foster Family Agency (the FFA) in July 2013. The FFA has two licensed offices, one in the Second Supervisorial District and one in the Fifth Supervisorial District and provides services to County of Los Angeles DCFS foster children and youth. According to the FFA's program statement, its mission is to "provide a safe, nurturing, therapeutic foster home where children can receive protection from abuse, maltreatment and from an unsafe environment."

At the time of the review, the FFA supervised 188 DCFS placed children in 77 certified foster homes. The placed children's average length of placement was 14 months, and their average age was 10.

### **SUMMARY**

During OHCMD's review, the interviewed children generally reported: feeling safe at the FFA; having been provided with good care and appropriate services; being comfortable in their environment and treated with respect and dignity. The certified foster parents reported they were supported by the FFA staff in their efforts to provide care, supervision and service delivery to the children placed in their homes.

The FFA was in full compliance with 7 of 11 sections of our program compliance review: Facility and Environment; Health and Medical Needs; Psychotropic Medication; Personal Rights and Social/Emotional Well-Being; Personal Need/Survival and Economic Well-Being; Discharged Children; and Personnel Records.

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OHCMD noted deficiencies in the areas of: Licensure/Contract Requirements, related to two Community Care Licensing (CCL) citations as a result of deficiencies and findings during CCL investigations complaints; Certified Foster Homes, related to the FFA failing to submit inquiries to OHCMD for historical abuse/neglect information for two prospective certified foster parents prior to certification, one certified foster parent had an untimely health screening, one certified foster parent did not have a current CPR and First Aid certificate, and a certified foster mother's file had documentation of a "delay in notification" response for her boyfriend's criminal record clearances; Maintenance of Required Documentation and Service Delivery, related to deficiencies regarding the Needs and Services Plans (NSPs), as Initial NSPs were not sent to the DCFS Children's Social Workers (CSWs) in a timely manner, Initial/Updated NSPs did not contain all required elements in accordance with the NSP template and certified foster parents were not offered the opportunity to participate in the development of the Initial NSPs, for two children there was no verification that the FFA social workers contacted the children's CSW on a monthly basis, and for one child, there was no documentation that the FFA social worker visited the child four times per month, as required by the Contract and; Education and Workforce Readiness, related to one child not having documentation that the child was enrolled in school within the required timeframe nor was there any documentation of the school status or educational progress, for another child, there were no progress notes or report cards in the child's file.

Attached are the details of our review.

## **REVIEW OF REPORT**

On August 6, 2013, the DCFS OHCMD Monitor, Cori Shaffer, held an Exit Conference with FFA representatives, Vajezatha Payne, Administrator of the Palmdale office, Andi Leigh, Supervising Social Worker from the Palmdale office and telephonically with Paulette Buchanan, Program Coordinator and Administrator from the Los Angeles office. The FFA's representatives: agreed with the review findings and recommendations; were receptive to implementing systemic changes to improve their compliance with regulatory standards; and agreed to address the noted deficiencies in a Corrective Action Plan (CAP).

The FFA provided the attached approved CAP addressing the recommendations noted in this compliance report.

On September 11, 2013 the FFA was placed on a termination hold and was notified that the FFA Services Contract between the FFA and the Department of Children and Family Services County of Los Angeles would expire on October 31, 2013, without further extension and would not be renewed due to California Department of Social Services issuing Notice of Foster Care Rate Termination effective November 1, 2013. This is due to the FFA having its non-profit exemption status revoked by the Internal Revenue Service (IRS) for the FFA's failure to timely complete and file its 990 tax returns for three consecutive years.

On September 19, 2013, OHCMD began the safe transition of DCFS placed children and their certified foster parents. On October 31, 2013, all appropriate certified foster parents and children were transitioned from the FFA.

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A copy of this compliance report has been sent to the Auditor-Controller and Community Care Licensing.

If you have any questions, your staff may contact me or Aldo Marin, Board Relations Manager, at (213) 351-5530.

PLB:EM:KR RDS:kn

### Attachments

c: William T Fujioka, Chief Executive Officer
John Naimo, Auditor-Controller
Public Information Office
Audit Committee
Renee Moncito, Executive Director, Wings of Refuge FFA
Lajuannah Hills Regional Manager, Community Care Licensing

## WINGS OF REFUGE FOSTER FAMILY AGENCY CONTRACT PROGRAM COMPLIANCE MONITORING REVIEW-SUMMARY

5777 W. Century Blvd., Suite 910 Los Angeles, CA 90045 License Number: 197803995

38345 30<sup>th</sup> Street East Palmdale, CA 93535 License Number: 197804903

Cont	ract Compliance Monitoring Review	Findings: July 2013	
Lice	<u>licensure/Contract Requirements</u> (7 Elements)		
1.	Timely Notification for Child's Relocation	1.	Full Compliance
2.	Serious Incident Report Documentation and Cross Reporting	2.	Full Compliance
3.	Runaway Procedures in Accordance with the Contract	3.	Full Compliance
4.	Are there CCL Citations/OHCMD Safety Reports	4.	Improvement Neede
5.	If Applicable, FFA Ensures Complete Required Whole Foster Family Home (WFFH) Training	5.	Not Applicable
6.	FFA Pays Certified Foster Parents (CFP) WFFH Required Supplemental Payments	6.	Not Applicable
7.	FFA Conducts an Assessment of CFP Prior to Placement of Two (2) or More Children	7.	Full Compliance
Certi	fied Foster Homes (CFHs) (12 Elements)		
1.	Home Study and Safety Inspection Conducted Prior to Certification	1.	Full Compliance
2.	Agency's Inquiry with OHCMD for Historical Information Prior to Certification	2.	Improvement Neede
3.	Timely Criminal Clearances (DOJ, FBI, CACI) Prior to Certification	3.	Full Compliance
4.	Timely, Completed, Signed Criminal Background Statement	4.	Full Compliance
5.	Health Screening & TB Test Prior to Certification	5.	Improvement Neede
6.	All Required Training Prior to Certification	6.	Full Compliance
7.	Certificate of Approval on File/Including Capacity	7.	Full Compliance
8.	Safety Inspections Completed At Least Every Six Months or Per Approved Program Statement	8.	Full Compliance
9.	Completed Annual Training Hours for Recertification and Current CPR/First-Aid/Water Safety Certificates	9.	Improvement Needed

	10.	Current CDL/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and	10.	Full Compliance
	11.	Designated Drivers, if Applicable Car Seat(s) Criminal Clearances and Health Screening/ CDL/CPR DOJ/FBI/CACI/Auto Insurance for Other Adults in the Home	11.	Improvement Needed
	12.	FFA Assists CFPs in Providing Transportation Needs	12.	Full Compliance
III	Facility and Environment (7 Elements)			
	1. 2. 3. 4.	Exterior/Grounds Well Maintained Common Areas/Interior Well Maintained Children's Bedrooms/Interior Well Maintained Sufficient and Appropriate Educational Resources	Full C	Compliance (ALL)
	5. 6.	Adequate Perishable and Non-Perishable Food CFP Conducted Disaster Drills and Documentation Maintained		
	7.	Money and Clothing Allowance Logs Maintained		E .
IV		tenance of Required Documentation/Service ery (10 Elements)		
	1.	FFA Obtains or Documents Efforts to Obtain County Children's Social Worker's (CSW) Authorization to Implement NSPs	1.	Improvement Needed
	2. 3.	CFPs Participated in Development of the NSPs Children Progressing Towards Meeting NSP Goals	2. 3.	Improvement Needed Improvement Needed
	4.	FFA Social Workers Develop Timely, Comprehensive Initial NSP with Child's Participation	4.	Improvement Needed
	5.	FFA Social Workers Develop Timely, Comprehensive Updated NSPs with Child's Participation	5.	Improvement Needed
	6.	Therapeutic Services Received	6.	Improvement Needed
	7.	Implemented	7.	Full Compliance
	8.	County Children's Social Workers Monthly Contacts Documented in Child's Case File	8.	Improvement Needed
	9.	FFA Social Workers Develop Timely, Comprehensive Quarterly Reports	9.	Improvement Needed
	10.	FFA Social Workers Conduct Required Visits	10.	Improvement Needed

V	<b>Education and Workforce Readiness</b> (5 Elements)	
	Children Enrolled in School Within Three School Days	Improvement Needed
	2. Children Attend School as Required and FFA Facilitates in Meeting Children's Educational Goals	The state of the s
	3. Current Children's Report Cards/Progress Reports Maintained	3. Improvement Needed
	Children's Academic Performance and/or     Attendance Increased	4. Improvement needed
	5. FFA Facilitates Child's Participation in YDS or Equivalent Services and Vocational Programs	5. Full Compliance
VI	Health and Medical Needs (4 Elements)	
	<ol> <li>Initial Medical Exams Conducted Timely</li> <li>Follow-Up Medical Exams Conducted Timely</li> <li>Initial Dental Exams Conducted Timely</li> <li>Follow-Up Dental Exams Conducted Timely</li> </ol>	Full Compliance (ALL)
VII	Psychotropic Medication (2 Elements)	
	Current Court Authorization for Administration of Psychotropic Medication	Full Compliance (ALL)
	2. Current Psychiatric Evaluation Review	
VIII	Personal Rights and Social Emotional Well-Being (10 Elements)	
	Children Informed of Agency's Policies and Procedures	Full Compliance (ALL)
	2. Children Feel Safe in the CFP Home	
	3. CFPs' Efforts to Provide Nutritious Meals and Snacks	8
	4. CFPs Treat Children with Respect and Dignity	
	5. Children Allowed Private Visits, Calls and to	
	Receive Correspondence 6. Children Free to Attend or Not Attend Religious Services/Activities of Their Choices	
	7. Children's Chores Reasonable	
	8. Children Informed About Their Medication and	
	Right to Refuse Medication 9. Children Aware of Right to Refuse or Received	
	Medical, Dental and Psychiatric Care	
	<ol> <li>Children Given Opportunities to Participate in Extra-Curricular Activities, Enrichment and Social Activities</li> </ol>	

IX	Personal	Needs/Survival and Economic	
	Well-Beir	ng (7 Elements)	
	•	_	Full Compliance (ALL)
		cordance with FFA Program Statement	
		going Clothing Inventories of Adequate antity and Quality	
		ildren's Involvement in Selection of Their	2
		othing	5
		ovision of Sufficient Supply of Clean Towels	
		d Personal Care Items Meeting Ethnic	
	Ne	eds	
		nimum Weekly Monetary Allowances	
		nagement of Allowance/Earnings	
		couragement/Assistance with Life Book or oto Album	3
X		ed Children (3 Elements)	
	Discharge	ed Cimaren (5 Elements)	
	1. Co	mpleted Discharge Summary	Full Compliance (ALL)
		empts to Stabilize Children's Placement	,
	3. Ch	ild Completed High School (if applicable)	
		10.5	
XI	Personne	el Records ( 9 Elements)	
	1. Cri	minal Clearances (DOJ, FBI, CACI) Signed	Full Compliance (ALL)
		d Submitted Timely	T dii Compilance (ALL)
		nely, Completed, Signed Criminal	
	Bac	ckground Statement	
		A Social Workers Met Education/Experience	
		quirements	
		nely Employee Health Screening/ Clearances	
İ	*	lid CDL and Auto Insurance	
		A Employees Signed Copies of FFA Policies	
		d Procedures	
		A Employees Completed All Required	
	Tra	ining and Documentation Maintained	
	8. FF		
		seload Ratio	_
		A Maintained Written Declarations for	
		rt-Time Contracted FFA Social Workers seloads Not Exceed Total of 15 Children	
	Cas	Scioads Not Exceed Total Of 13 Children	

### WINGS OF REFUGE FOSTER FAMILY AGENCY CONTRACT COMPLIANCE MONITORING REVIEW FISCAL YEAR 2013-2014

### **SCOPE OF REVIEW**

The following report is based on a "point in time" monitoring visit. The compliance report addresses findings noted during the July 2013 review. The purpose of this review was to assess Wings of Refuge Foster Family Agency's (the FFA's) compliance with the County contract and State regulations and included a review of the FFA's program statement, as well as administrative internal policies and procedures. The monitoring review covered the following 11 areas:

- Licensure/Contract Requirements,
- Certified Foster Homes,
- Facility and Environment,
- Maintenance of Required Documentation and Service Delivery,
- Educational and Workforce Readiness.
- Health and Medical Needs,
- Psychotropic Medication,
- · Personal Rights and Social Emotional Well-Being,
- Personal Needs/Survival and Economic Well-Being,
- Discharged Children, and
- Personnel Records.

For purposes of this review, thirteen children were selected for the sample. The Out-of-Home Care Management Division (OHCMD) interviewed nine children to assess the care and services they received. One child was not home at the time of the visit, two children were pre-verbal and one child was tired and did not want to be interviewed; however, the children were observed to be in good health. OHCMD reviewed all 13 children's case files to assess the care and services they received. Additionally, five discharged children's files were reviewed to assess the FFA's compliance with permanency efforts. At the time of the review, nine placed children were prescribed psychotropic medication. We reviewed their case files to assess for timeliness of Psychotropic Medication Authorizations and to confirm the required documentation of psychiatric monitoring.

OHCMD reviewed six certified foster parent files and five staff files for compliance with Title 22 Regulations and County contract requirements. Interviews were conducted with six certified foster parents to assess the quality of care and supervision provided to the children.

### **CONTRACTUAL COMPLIANCE**

OHCMD found the following four areas to be out of compliance.

### **Licensure/Contract Requirements**

 Community Care Licensing (CCL) cited the FFA as a result of deficiencies and findings during the investigation of a CCL complaint. According to a CCL complaint investigation report dated April 30, 2013, CCL cited the FFA for Care and Supervision violation when it was determined that the certified foster parent tested positive for marijuana without providing any valid reason(s)

for the positive test results. No Plan of Correction (POC) was requested by CCL as the certified foster parent was decertified.

A referral was generated by the Child Protection Hotline. This referral was investigated by the DCFS Emergency Response Children's Social Worker (ER CSW). The referral alleged that the certified foster parent used crystal methamphetamines in the garage on a regular basis. The certified foster parent agreed to complete an on demand drug test and tested positive for marijuana. The DCFS ER CSW concluded the allegation of General Neglect as Substantiated and all placed children were replaced. Out-of-Home Care Investigations Section (OHCIS) placed the home on "Indefinite Hold" and it will no longer be used as a placement resource for DCFS children. The FFA decertified the foster parent on May 1, 2013.

• Community Care Licensing (CCL) cited the FFA as a result of deficiencies and findings during the investigation of a CCL complaint. According to a CCL complaint investigation report dated September 25, 2013, CCL cited the FFA for Care and Supervision violation. It was determined that a certified foster parent did not properly supervise a placed child, as a result, the child sustained second degree burns to the hands and wrists when the child's hands were submerged in scalding hot water in the certified foster home. No POC was requested by CCL as the certified foster parent was decertified.

This referral was investigated by DCFS ER CSW. The referral alleged that a 3 year old child sustained a second degree burn resulting from scalding hot water to the child's arms when the child was playing with hot water while left unsupervised in the certified foster home. The DCFS ER CSW substantiated the allegation of General Neglect and the placed children were removed from the home. The allegation of Severe Neglect and Physical Abuse were Inconclusive. The FFA decertified the home for cause effective August 12, 2013, due to the DCFS substantiated allegation of General Neglect. OHCIS substantiated the allegation of General Neglect and placed the home on an "Indefinite Hold" on July 29, 2013, and the home will no longer be used as a placement resource for DCFS children.

#### Recommendation

The FFA's management shall ensure that:

1. The FFA is in full compliance with Title 22 Regulations and free of CCL citations.

### **Certified Foster Homes**

• Of the six foster parent files reviewed, two certified foster parents' records did not include the FFA's inquiry to OHCMD for historical abuse/neglect information prior to certification.

During the review process, OHCMD completed a review of historical abuse/neglect information and there were no issues noted that would prevent the individuals from being placement resources. During the Exit Conference, the FFA Administrator indicated that they would ensure that their support staff sends inquiries to OHCMD for all potential applicants and that the FFA Supervising Social Worker would provide oversight to ensure ongoing compliance.

 One foster parent certified in April 2008, records contained documentation of an initial health screen/TB test on file from January 2007, which was four months late.

During the Exit Conference, the FFA Administrator indicated that their certified foster parent files will be closely monitored by support staff and the FFA Supervising Social Worker will provide ongoing oversight to ensure Contract and Title 22 compliance.

• For one certified foster home, there was no documentation in the file that the certified foster father had a current CPR/First Aid certificate.

During the review process, the FFA provided verification that the foster father completed his CPR/First Aid training certificates. During the Exit Conference, the FFA Administrator indicated that the FFA Recruiter will ensure that all required documentation in the certified foster parent file is current and that the Supervising Social Worker will provide oversight to ensure ongoing compliance.

• For one certified foster home, OHCMD found that there was a "Delay in Notification" letter from the California State Department of Justice for the certified foster parent's boyfriend who frequents the home. We did not find any follow-up by the FFA with regard to the delay letter and it was not known what the letter meant.

### Recommendations

The FFA's management shall ensure that:

- 2. The FFA's certified foster parents' file includes the FFA's inquiry with OHCMD for historical abuse/neglect information prior to certification.
- 3. The FFA's certified foster parents' files contain verification of timely health screenings/TB tests prior to certification.
- 4. The FFA's certified foster parent's files contain timely, current CPR/First Aid certificates.
- 5. The FFA's certified foster parents' files contain all of the necessary information and clearances for additional adults who reside in the home, frequent the home or babysit the children placed in the home and that the FFA develops a plan for ongoing monitoring of the files to ensure that the required documentation is maintained.

### Maintenance of Required Documentation/Service Delivery

 The FFA did not obtain or document efforts to obtain the DCFS CSW's signature authorizing implementation of a Needs and Services Plan (NSP) in a timely manner. The child was placed in February 2013, and the Initial Needs and Services Plan (NSP) were not sent to Department of Children and Family Services Children Social Worker (CSW) until July 2013.

During the Exit Conference, the FFA Administrator indicated that the FFA Supervising Social Worker will ensure that Initial NSPs are sent timely to DCFS case carrying CSW in a timely manner.

• For two children, the certified foster parents were not offered the opportunity to participate in the development of the Initial NSPs.

During the Exit Conference, the FFA Administrator indicated that the FFA Supervising Social Worker will ensure that the certified foster parents participate in the development of the NSPs and documentation is maintained in the children's files.

 For one child, OHCMD was unable to determine if the child was progressing towards meeting the Initial NSP goals as there was no information in the Initial NSP with regard to educational or placement goals noted.

During the Exit Conference, the FFA Administrator indicated that the FFA Supervising Social Worker will be responsible for verifying that the Initial NSPs are detailed and contain all required elements in accordance with the NSP template.

• For one child's Initial NSP, there was no documentation that the age-appropriate youth participated in the development of the Plan.

During the Exit Conference, the FFA Administrator indicated that the FFA Supervising Social Worker will be responsible for ensuring that the Initial NSPs are developed with the age-appropriate child and documentation is maintained in the children's files.

For one placed child, OHCMD found no information in the file that the child was receiving or
was referred to necessary therapeutic services. During the visit to the certified foster home,
OHCMD was informed that the child had been displaying serious behavior problems that were
compromising the placement and there had been no therapeutic intervention to mitigate the
situation.

During the Exit Conference, this was brought to the FFA Administrator's attention who indicated that the FFA social worker immediately attended to the matter and referred the child for therapeutic services and this would be closely monitored by the FFA Supervising Social Worker.

For two placed children, OHCMD found no verification in the children's files that their DCFS
Children's Social Workers were contacted monthly by the FFA Social Worker. For one child,
there was no contact for the month of July 2012. For another child, placed in January 2013, the
contacts for each month were the same typewritten sentences and no details were noted.

During the Exit Conference, the FFA Administrator indicated that this matter would be addressed immediately and that the FFA Supervisor would provide close oversight to ensure that ongoing open communication would be maintained and interventions put in place to best assist the child's needs.

 The Quarterly Reports for two children were not comprehensive. For one Quarterly Report, there were no child or certified foster parent signatures on the report indicating that they were not discussed with the required parties. For another child who had serious behavior problems, there was no information about therapeutic interventions or contact with DCFS CSW to attempt to mitigate the problems.

During the Exit Conference, the FFA Administrator indicated that they would ensure ongoing oversight was provided by the FFA Supervisors and that an all staff training would be conducted with regard to comprehensive NSPs.

 For one youth placed in April 2013, OHCMD found documentation indicating that the FFA Social Worker only visited the youth twice, instead of the required four times in the month of June 2013.

During the Exit Conference, the FFA Administrator indicated that the FFA Supervising Social Worker will monitor the FFA Social Worker to ensure that all visits are occurring as per Title 22 regulations.

### Recommendation

The FFA's management shall ensure that:

- 6. The FFA obtains or documents efforts to obtain the County Children's Social Worker's authorization to implement the children's NSPs.
- 7. The FFA maintains documentation that the certified foster parents participate in the development of the children's NSPs.
- 8. The FFA ensures that placed children are progressing towards the NSP goals.
- 9. The FFA develops a timely, comprehensive Initial NSP with the participation of the age-appropriate child.
- 10. The FFA develops a timely, comprehensive Updated NSP with the participation of the age-appropriate child.
- 11. The FFA ensures that children are receiving necessary therapeutic services.
- 12. The FFA ensures that County Children's Social Workers are contacted monthly and contacts are appropriately documented in the files.
- 13. The FFA develops timely, comprehensive Quarterly Reports.
- 14. The FFA ensures that FFA Social Workers conduct required visits with placed children in accordance with the Contract.

#### **Education and Workforce Readiness**

 For one child placed in January 2013, OHCMD did not find any documentation in the file with regard to school enrollment and was unable to determine if the child was enrolled in school within the required timeframe of three school days.

- For the same child noted above, OHCMD did not find any information on the child's educational goals or progress in the child's file and thus was unable to determine if educational needs were being met.
- Additionally, for the same child, OHCMD did not find any copies of progress reports or report
  cards in the child's file and documentation was not maintained in the file.
- Lastly, for the same child, OHCMD was unable to determine if the child's academic and/or attendance increased as there was no educational information in the child's file. During the Exit Conference, the FFA Administrator indicated that they would look into the matter and will discuss the issue with the FFA Social Workers during an all staff meeting and would ensure ongoing oversight by the FFA Supervising Social Worker and that documentation of such would be maintained in the files.

#### Recommendation

The FFA's management shall ensure that:

- 15. The FFA ensures that children are enrolled in school within three school days of placement.
- 16. The FFA ensures that the child attends school as required and facilitates in meeting the child's educational goals.
- 17. The FFA ensures that current copies of the children's report cards or progress reports are maintained.
- 18. The FFA ensures that information on the child's academic and attendance records are maintained.

## PRIOR YEAR FOLLOW-UP FROM DCFS OHCMD'S FOSTER FAMILY AGENCY CONTRACT COMPLIANCE MONITORING REVIEW

The OHCMD's last compliance report dated December 24, 2012, identified 12 recommendations.

#### Results

Based on OHCMD follow-up, the FFA fully implemented 5 of 12 previous recommendations for which they were to ensure that:

- Current CDL/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers is maintained in the CFP files.
- Current Report Cards are maintained.
- Initial Medical Examinations are conducted timely.
- Initial Dental Examinations are conducted timely.

Staff complete timely signed criminal background statements.

Based on our follow-up, the FFA did not fully implement seven of the previous twelve recommendations for which they were to ensure:

- The FFA is in full compliance with Title 22 Regulations, free of CCL's citations.
- Initial NSPs are comprehensive and developed timely with the participation of the age-appropriate children.
- Updated NSPs are comprehensive and developed timely with the participation of the age-appropriate children.
- Children receiving required therapeutic services.
- FFA social workers contacting the children case-carrying CSWs monthly.
- FFA social workers conducting required child visits.
- Children's academic performance and/or attendance increased.

#### Recommendation

The FFA's management shall ensure that:

19. The outstanding recommendations from the 2012 monitoring report dated December 24, 2012 which, are noted in this report as Recommendations 1, 9, 10, 11, 12, 14, and 18 are fully implemented.

At the Exit Conference, the FFA representatives expressed a desire to remain in compliance with all Title 22 Regulations and Contract requirements. To ensure the development of comprehensive NSPs, the FFA Supervisors and Administrators will review the NSPs prior to submittal, and they will ensure all efforts are made to obtain the DCFS CSW's authorization to implement NSPs. The FFA representatives will ensure the certified foster parents and age-appropriate children participate in the development of the NSPs and this is documented in the children's files. Additionally, the FFA staff attended the NSP training in July 2013 and the FFA Administration held a mandatory NSP training with all staff at the FFA for updates and changes to the NSPs. The FFA staff will conduct monthly meetings during which, the children's progress toward achieving NSP goals including therapeutic and educational goals will be addressed. The FFA Administrator indicated that the FFA Supervisors will meet monthly with the FFA social work staff to ensure that visits with the children and contacts with the children's County case-carrying CSWs are occurring as per requirements. The FFA Executive Director and the Administrator will conduct periodic checks to monitor compliance with the CAP.

On September 11, 2013 the FFA was placed on a termination hold and was notified that the FFA Services Contract between the FFA and the Department of Children and Family Services County of Los Angeles would expire on October 31, 2013, without further extension and would not be renewed due to California Department of Social Services issuing Notice of Foster Care Rate Termination effective November 1, 2013, due to the FFA having its non-profit exemption status revoked by the Internal Revenue Service (IRS) for the FFAs failure to timely complete and file its 990 tax returns for three consecutive years.

On September 19, 2013, OHCMD began the safe transition of DCFS placed children and their certified foster parents. On October 31, 2013, all appropriate certified foster parents and children were transitioned from the FFA.

### MOST RECENT FISCAL REVIEW CONDUCTED BY THE AUDITOR-CONTROLLER (A-C)

A fiscal review of Wings of Refuge FFA was completed December 19, 2011, for the period of January 1 to December 31, 2008. The following findings were noted:

A total of \$32,026.00 in unallowable expenditures and \$49,831.00 in unsupported/inadequately supported expenditures were noted. Also noted was the Agency's 2008 financial statements which, reported a significant debt of \$2.2 million and negative net assets of \$18,176.00.

A Fiscal Corrective Action Plan (FCAP) was completed and reviewed by DCFS Fiscal Monitoring and Special Payments Section. The FFA was requested to sign a repayment agreement for the amount of \$81,857.00 and they are being monitored by the Fiscal Monitoring Section. According to a current update from DCFS Fiscal Monitoring Section, the FFA has a FFA Overpayment of \$7,894.00 with the Department, and a payment of \$5,260.00 was received from the FFA on August 27, 2013. As for the repayment agreement for the amount of \$81,857.00, the FFA has been sending monthly payments of \$2,273.80 to the County of Los Angeles Treasurer and Tax Collector. OHCMD contacted DCFS Fiscal section on November 7, 2014, and was informed that the FFA owes \$13,854.20; last payment date was December 12, 2013.